

## Comments

### *Hoop Valley Tribal Council*

#### *Land Management Division*

*Tribal Environmental Protection Agency*

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November 17, 1998

Superintendent Mary Martin  
Mojave National Preserve  
222 East Main Street, Suite 202  
Barstow, CA 92311

Dear Ms. Martin,

I am writing to comment on the Environmental Impact Statement (EIS) and General Management Plan for the Mojave National Preserve (MNP). As a former student and researcher for the University of California, and current biologist and environmental planner for California's largest Tribal Nation (Hoopa Valley Tribe), I have great concerns over the alternatives proposed in the abovementioned documents. My concerns are as follows:

HV1

1. Research and education must be protected to fulfill the mission of the Mojave National Preserve. The mission of the Mojave National Preserve is "to preserve outstanding natural, cultural and scenic resources, while providing for scientific, educational and recreational interests." Preservation requires information on environmental condition. How can MNP ensure that the environment is preserved without protecting areas for research?

HV2

2. Research and education in the Natural Reserve are not adequately protected by any of the alternatives in the EIS. Alternatives 1 and 2 allow environmental degradation caused by recreational activity in the Natural Reserve. Although Alternative 3 is the most supportive, environmental degradation caused by recreational activity would have to occur BEFORE management actions were taken. Thus all three alternatives ensure that adverse impacts to research and education will occur.

HV3

3. This EIS does not address the full range of possible alternatives as required by law. It does not consider:

- a) protecting Natural Reserve lands from recreational activity BEFORE damage to resources or research occurs.
- b) protecting Natural Reserve lands for future research on impacted desert environments.
- c) designating Natural Reserve lands as an area where research projects are adequately protected from damage, vandalism, or disruption. These alternatives are compatible with existing NPS rules and regulations which allow for the designation of research natural

## Responses

- HV1. While the section on cultural resources addressed research, a corresponding section for natural resources was inadvertently omitted in the draft plan. A section addressing research as a priority for the preserve is now included in the plan.
- HV2. Research and education in the Granite Mountains are better protected now than at any time in the history of the area. Congress designated most of the area as wilderness in 1994, prohibiting motorized vehicle access and the use of mechanized equipment. The National Park Service is actively removing feral burros from the area and is committed to a zero burro population. No shooting is permitted in the reserve. Recently, the park accepted donation of the grazing permit for this area, resulting in the removal of cattle grazing for the first time in about 140 years. The area is now included within the boundaries of a national park unit, providing some of the best preservation available under federal law. The proposed action states the National Park Service would work with the universities to ensure protection of research plots. None of the alternatives in the draft plan "allow environmental degradation."
- HV3. We believe the items you suggest are all addressed within the proposed action alternative. In creating the reserve, Congress directed that the National Park Service enter into a cooperative agreement to ensure continuation of arid land research and education. Several actions already taken or proposed (see previous response) would provide some protection for research and education greater than what existed in the past. The cooperative agreement is the tool to address issues regarding other specific actions, and is more easily modified to adjust to changing conditions than is the *General Management Plan*. We believe that there are many other environments in the preserve where research and education activities should also occur outside the reserve. The National Park Service would like to work with the research and education community to identify concerns and mitigation that could apply to any research or education activity, as appropriate.

## Comments

areas that prohibit or restrict recreational use (e.g., Zion, Canyonlands, and the Channel Islands). These actions should be considered by the EIS.

HV4

4. Natural Reserve lands are critical for research and education in the Mojave Desert. They contain the only lands in the 35-million acre Mojave Desert where research and educational activities are protected. NPS lands in the Natural Reserve constitute only a fraction of 1% of the total lands in the MNP.

HV5

5. Without protection, research will decline in the MNP. "Lands within the Preserve are internationally known as a place to conduct research..." As recreational use increases, the risk of impact to research projects increases. If researchers are not confident that their research efforts will be protected, they will not take financial and career risks needed to attempt research in the Preserve.

HV6

6. With regard to my own experience relating research to recreational activities, I can say with great certainty that they don't often mix well. I was conducting a graduate research project on the Granite's raven population in 1992. During this time, I resided and did much of my work in and around the Granite Mountains Natural Reserve. On at least 10 separate occasions over a period of two months, my research and/or sleep was disturbed by "recreationalists" discharging automatic fire arms in my immediate vicinity. While the use of these kinds of weapons is controlled by other legislation of course, the primary reason for these people's trip to the MNP was to utilize off-road vehicles.

The MNP is such a vast area that much of this kind of activity is rampant and often unenforceable at current funding levels. It's only a matter of time before clashes intensify, and one or the other is sacrificed. Now is the time to devise solutions, and the alternatives presented not only do not go far enough, they're going in the wrong direction. Please reconsider your present alternatives and take advantage of some of the intellect assembled in and around the GMNR. Thank you for your time.

Sincerely,



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## Responses

- HV4. There are hundreds of thousands of acres of Mojave Desert in national park units where research and education activities may occur and would be afforded a vast amount of protection. While the reserve is a small amount of the total acreage of the preserve, it is also one of the more dramatic mountain ranges, situated along a major access road into the park.
- HV5. We believe there are many environments in the park where research should occur. We believe research data is critical to the future management of the preserve. We are interested in steps that the National Park Service can take to ensure protection of research not just within the reserve but throughout the park. Closing areas to public use is not a guarantee. Such a closure would require a vast amount of effort to enforce. Fencing the entire reserve to ensure no public access would be prohibitively expensive and would create aesthetic problems and impede wildlife movement.
- HV6. This is a good example of the type of activity that previously occurred in the preserve, but which is declining significantly with the change in agency management and mission. More rangers in the field enforcing the laws are also reducing the illegal activities that you note.